

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Boston Edison Company,)

Cambridge Electric Light Company,)

Commonwealth Electric Company,) D.T.E. 00-70

Standard Offer Filing)

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**PETITION TO INTERVENE OF SOUTHERN ENERGY NEW ENGLAND
L.L.C.,**

On September 1, 2000, Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, and Canal Electric Company (collectively, the "Companies" or "Nstar") submitted a notice to the Department of Telecommunications and Energy ("Department") in docket D.T.E No.00-70, that they would implement a Standard Offer Adjustment of 0.581 cents per kilowatt-hour ("kWh") for Boston Edison and 0.650 cents per kWh for Cambridge and Commonwealth. Southern Energy New England L.L.C. ("Southern") entered into a Wholesale Transition Service Agreement with Cambridge and Commonwealth dated May 15, 1998 to supply a portion of the Standard Offer service for said companies. ("Wholesale Agreement"). Pursuant to 220 C.M.R 1.03, Southern hereby petition the Department for leave to intervene in the above-captioned proceeding. In support of this petition, Southern states the following grounds:

1. Southern and its affiliates are engaged in the development and operation of non-utility generation facilities in the United States and the sale of energy at wholesale. The principal place of business of Southern is at 900 Ashwood Parkway, Suite 500, Atlanta, Georgia 30338.

2. Southern entered into the Wholesale Agreement to supply a portion of the Standard Offer supply to Cambridge and Commonwealth. Cambridge and Commonwealth have not to date paid Southern for the Fuel Trigger payments due under said contract.
3. Southern's interests may be affected substantially and specifically by the Department's adjudication of the notice submitted by NStar.
4. Southern's interest in this proceeding cannot be adequately represented by any other party to this proceeding.
5. Southern seeks to participate as a full intervenor in this case, and where appropriate, file comments, attend and participate in technical conferences, present witnesses, file discovery, cross-examine witnesses, and submit briefs.

WHEREFORE, for the reasons stated above, Southern Energy New England, L.L.C., requests that the Department grant their Petition to Intervene.

Respectfully submitted,

Andrew J. Newman

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Counsel for

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Dated: September 22, 2000